

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>HILARIO RAZURA JIMENEZ, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Civil Action No. 3:11-0276</b>
	)	
<b>v.</b>	)	
	)	
<b>VANDERBILT LANDSCAPING, LLC, et al.,</b>	)	<b>Chief Judge Campbell</b>
	)	<b>Magistrate Judge Knowles</b>
	)	
<b>Defendants.</b>	)	

**CONSENT MOTION FOR EXTENSION  
OF TIME TO RESPOND TO DEFENDANT’S MOTION TO AMEND  
COUNTERCLAIMS**

With consent of counsel for Defendants Vanderbilt Landscaping LLC, Larry Vanderbilt, and Joffrey Vanderbilt (the “Vanderbilt Defendants”), Plaintiffs hereby move the Court to extend the time in which to answer or otherwise respond to the Vanderbilt Defendants’ Motion to Amend Counterclaims filed on Monday, August 22, 2011 (Doc. 54). Pursuant to LR 7.1, Plaintiffs’ response is currently due 14 days later on September 5, 2011.

The proposed amendment would add new claims and parties and counsel for Plaintiffs respectfully requests an additional 30 days, until October 5, 2011, to adequately prepare a response. The Vanderbilt Defendants consent to the request. This extension of time will not prejudice any party or this Court and will not delay other deadlines or case scheduling.

A proposed Order is being filed along with this motion.

Respectfully submitted,

s/ Charles P. Yezbak, III

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### **CERTIFICATE OF SERVICE**

This is to hereby certify that I have this 31 day of August 2011 I electronically filed the above with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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Dated August 31, 2011

s/ Charles P. Yezbak, III

Charles P. Yezbak, III